

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**PLAINTIFFS' MOTION TO FILE AMENDED VERSIONS OF THE
EXHIBITS TO THE FIRST AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a), Plaintiffs Sony Music Entertainment, Arista Music, Arista Records LLC, LaFace Records LLC, Provident Label Group, LLC, Sony Music Entertainment US Latin, Volcano Entertainment III, LLC, Zomba Recordings LLC, Sony/ATV Music Publishing LLC, EMI Al Gallico Music Corp., EMI Algee Music Corp., EMI April Music Inc., EMI Blackwood Music Inc., Colgems-EMI Music Inc., EMI Consortium Music Publishing Inc. d/b/a EMI Full Keel Music, EMI Consortium Songs, Inc., individually and d/b/a EMI Longitude Music, EMI Feist Catalog Inc., EMI Miller Catalog Inc., EMI Mills Music, Inc., EMI Unart Catalog Inc., EMI U Catalog Inc., Jobete Music Co. Inc., Stone Agate Music, Screen Gems-EMI Music Inc., Stone Diamond Music Corp., Atlantic Recording Corporation, Bad Boy Records LLC, Elektra Entertainment Group Inc., Fueled By Ramen LLC, Roadrunner Records, Inc., Warner Bros. Records Inc., Warner/Chappell Music, Inc., Warner-Tamerlane Publishing Corp., WB Music Corp., W.B.M. Music Corp., Unichappell Music Inc., Rightsong Music Inc., Cotillion Music, Inc., Intersong U.S.A., Inc., UMG Recordings, Inc., Capitol Records, LLC,

Universal Music Corp., Universal Music – MGB NA LLC, Universal Music Publishing Inc., Universal Music Publishing AB, Universal Music Publishing Limited, Universal Music Publishing MGB Limited, Universal Music – Z Tunes LLC, Universal/Island Music Limited, Universal/MCA Music Publishing Pty. Limited, Music Corporation of America, Inc. d/b/a Universal Music Corp., Polygram Publishing, Inc., and Songs of Universal, Inc., (collectively, “Plaintiffs”), respectfully request the Court grant permission for Plaintiffs to file amended versions of the exhibits to their First Amended Complaint.

Plaintiffs seek leave to file under the liberal standard of Rule 15(a)(2) and consistent with the Court’s Scheduling Orders. ECF No. 53 (Proposed Joint Discovery Plan); ECF No. 60 (Rule 16(b) Scheduling Order adopting the parties’ proposed stipulated schedule); ECF No. 138 (Order modifying Rule 16(b) Scheduling Order). The proposed amended versions of Exhibits A and B to the First Amended Complaint (“Amended Exhibits”) are attached hereto. The grounds for this Motion are set forth in the accompanying memorandum.

LOCAL RULE 7(E) MEET AND CONFER STATEMENT

On May 14, 2019, Plaintiffs requested the consent of Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, “Cox”) to this motion. On May 15, 2019, counsel for Cox declined to stipulate to Plaintiffs’ motion, indicating that they need to review the Amended Exhibits.

Dated: May 15, 2019

Respectfully Submitted,

/s/ Scott A. Zebrak

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